UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

JOHN BRIDGELAL and WILKINS BELLAIRD Individually and on Behalf of All Others Similarly Situated,	: ECF CASE
Plaintiffs,	: CV 15-3571 (ADS) (AKT)
- against -	:
NY RENAISSANCE CORP., DAN PIRVULESCU and MONIQUE DELACROIX,, Jointly and Severally,	:
Defendants.	:

DECLARATION OF GARY ADELMAN IN OPPOSITION TO MOTION TO CONDITIONALLY CERTIFY A FAIR LABOR STANDARDS ACT COLLECTIVE ACTION AND AUTHORIZE NOTICE TO BE ISSUED TO ALL PERSONS SIMILARLY SITUATED

GARY ADELMAN, pursuant to 28 U.S.C. § 1746, declares under the penalty of perjury, as follows:

1. I am a partner at the law firm of Adelman Matz P.C., attorneys for NY Renaissance Corp. ("NYR"), Dan Pirvulescu and Monique Delacroix (collectively referred to as "Defendants"). As such, I am fully familiar with the facts and circumstances herein based upon my personal handling of the file.

2. I make this declaration in opposition to the motion of Plaintiffs John Bridgelal and Wilkins Belliard individually and on behalf of others similarly situated, ("Plaintiffs"), seeking an order from the Court to conditionally certify a conditional collective action against Defendants under the Fair Labor Standards Act (the "FLSA") and to authorize that notice be sent to other employees similarly situated.

3. A true and correct copy of a complaint, dated July 10, 2015, filed in New York State Supreme Court, in the County of Nassau, entitled *Romero, et al., v. NY Renaissance Corp., et al.*, Index No. 604495/2015, is annexed hereto as **Exhibit 1**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 17, 2016, New York, New York.

GARY ADELMAN